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Heidi K. Hoffman  
U.S. Department of Justice  
Environment & Natural Resources Div.  
Denver Place Bldg. – South Terrace  
999 18<sup>th</sup> Street, Suite 370  
Denver, CO 80202

Re: Gilt Edge Mine Site, Lawrence County, South Dakota

Dear Heidi:

I am writing to follow up on a couple of matters in light of our plans to meet in the near term regarding the Gilt Edge Site. As you know, Andrea Madigan and I had a good conversation earlier this week regarding CoCa's and Hecla's recent responses to EPA's requests for information, and CoCa and Hecla are considering how best to address the topics raised in that conversation.

Meanwhile, as we have discussed on several occasions over the past year, CoCa believes, based on all the available information—including the materials EPA itself has provided to CoCa—that to the extent CoCa has any liability for response costs at the Gilt Edge site, that liability is *de minimis*. Therefore, CoCa requests that before we meet, EPA and DOJ share their analysis of the liability they believe CoCa has at the site relative to the entire environmental harm which allegedly has occurred there, and relative to the other PRPs. Of course, feel free to contact me if you would like to discuss these points.

Sincerely,



Joseph G. Middleton

JGM/gg

cc: Dave Sienko, Esq.  
Michael Clary, Esq.  
Andrea Madigan, Esq., USEPA Region 8